

Michael R. Lazerwitz (PRO HAC VICE)
 Jeremy J. Calsyn (State Bar No. 205062)
 Lee F. Berger (State Bar No. 222756)
 CLEARY GOTTlieb STEEN & HAMILTON LLP
 One Liberty Plaza
 New York, NY 10006
 (212) 225-2000 (Phone)
 (212) 225-3999 (Facsimile)
 mlazerwitz@cgsh.com

Counsel for Defendants
 LG DISPLAY CO., LTD.
 LG DISPLAY AMERICA, INC.

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 (SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
 MDL NO. 1827

This Document Relates To:

**STIPULATION AND [PROPOSED]
 ORDER REGARDING EXTENSION OF
 TIME TO RESPOND TO DEFENDANTS'
 CONTENTION DISCOVERY REQUESTS**

*ATS Claim, LLC v. Epson Electronics America,
 Inc., et al., No. 09-cv-1115-SI, MQ*

*AT&T Mobility LLC v. AU Optronics Corp., et
 al., No. 09-cv-4997 SI, MQ*

*Best Buy Co., Inc. v. AU Optronics Corp., et al.,
 No. 3:10-cv-4572 SI, MQ*

*Costco Wholesale Corp. v. AU Optronics Corp.,
 et al., No. 3:11-cv-00058-SI, MQ*

*Dell, Inc. v. Sharp Corp., et al., No. 3:10-cv-
 01064-SI, MQ*

*Eastman Kodak v. Epson Imaging Devices Corp.,
 et al., No. 10-cv-5452-SI, MQ*

*Electrograph Systems, Inc. v. Epson Imaging
 Devices Corp., et al., No. 3:10-cv-00117-SI, MQ*

*Motorola Mobility, Inc. v. AU Optronics Corp.,
 et al., No. 09-cv-05840-SI, MQ*

*Nokia Corp. v. AU Optronics Corp., et al., No.
 3:09-cv-05609-SI, MQ*

3
4 WHEREAS, Defendants served discovery requests on Track One plaintiffs between October
5 31 and November 4, 2011, and to Costco Wholesale on October 26, 2011;

6 WHEREAS, under the Federal Rules of Civil Procedure, responses to those requests were due
7 on or before December 8, 2011;

8 WHEREAS, the Plaintiffs have requested, and Defendants have agreed to provide, additional
9 time to respond to this discovery;

10 WHEREAS, on December 7, 2011, the Parties agreed to extend the discovery deadline for
11 one week for the purpose of giving the Parties time to negotiate a longer extension;

12 NOW THEREFORE, the parties stipulate and agree as follows:

13 Plaintiffs' deadline in connection with the discovery requests served by Defendants on Track
14 One plaintiffs between October 31 and November 4, 2011, and to Costco Wholesale on October 26,
15 2011 is extended to January 30, 2012; excepting any agreements already in place between individual
16 Plaintiffs and Defendants; and

17 Defendants' deadline to file motions to compel with respect to this discovery shall be March
18 1, 2012.

1 DATED: December 20, 2011

2
3 By: /s/ Michael R. Lazerwitz

4 Michael R. Lazerwitz (PRO HAC VICE)
5 Jeremy J. Calsyn (State Bar No. 205062)
6 Lee F. Berger (State Bar No. 222756)
7 CLEARY GOTTlieb STEEN & HAMILTON LLP
8 One Liberty Plaza
9 New York, NY 10006
10 (212) 225-2000 (Phone)
11 (212) 225-3999 (Facsimile)
12 *mlazerwitz@cgsh.com*

13 *Counsel for Defendants LG Display Co., Ltd. and*
14 *LG Display America, Inc. and on behalf of*
15 *defendants other than SANYO*

16
17 /s/ Valarie C. Williams

18 Randall Allen (State Bar No. 264067)
19 **ALSTON + BIRD LLP**
20 275 Middlefield Road, Suite 150
21 Menlo Park, California 94025
22 Telephone: 650-838-2000
23 Facsimile: 650-838-2001
24 Email: *randall.allen@alston.com*

25 Peter Kontio (*peter.kontio@alston.com*)
26 Valarie C. Williams (*valarie.williams@alston.com*)
27 B. Parker Miller (*parker.miller@alston.com*)
28 **ALSTON + BIRD LLP**
1201 West Peachtree Street
Atlanta, Georgia 30309
Telephone: 404-881-7000
Facsimile: 404-881-7777

Richard W. Stimson (*rick.stimson@alston.com*)
ALSTON + BIRD LLP
Chase Tower, Suite 3601
2200 Ross Avenue
Dallas, Texas 75201
Telephone: 214-922-3400
Facsimile: 214-922-3899

Attorneys for Plaintiffs Nokia Corporation and
Nokia Inc. and on behalf of other Direct Action
Plaintiffs

1 **Attestation:** The filer of this document attests that the concurrence of the other signatories thereto
2 has been obtained.

3
4 By: /s/ Michael R. Lazerwitz
Michael R. Lazerwitz

[PROPOSED] ORDER

Under the parties' stipulation set forth above, IT IS SO ORDERED.

Dated: 12/23 , 2011

By: 

Hon. Susan Illston

United States District Judge